



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

November 6, 2008

MEMORANDUM:

Subject: EPA Reg. No.: 65109-1/Coperlate  
DP Barcode: 357937  
Case No.: 0649

From: Marianne Lewis, Biologist  
Product Reregistration Branch  
Special Review and Reregistration Division (7508C)

To: Veronica Dutch, CRM  
Product Reregistration Branch  
Special Review and Reregistration Division (7508C)

Applicant: SSI Corp  
P.O. Box 9  
Julesburg, CO 80737

*Marianne Lewis 11/6/08*

FORMULATION FROM EPA Reg. No. 65109-1 LABEL:

	<u>% by wt.</u>
<u>Active Ingredient(s):</u>	
Copper Sulfate Pentahydrate .....	20.0%
<u>Inert Ingredient(s):</u> .....	<u>80.0%</u>
Total	100.0%

BACKGROUND: In the 8 month response to the Copper RED, the registrant is citing acute toxicity studies to support the reregistration of their product, EPA Reg. No. 65109-1. The MRID's are as follows: 126652 (81-1, 81-2, 81-4, 81-5), 419161-01 (81-1), 419161-02 (81-2), 419161-03 (81-5), 413948-01 (81-6). MRID # 126652 was conducted by Hill Top Research, Inc. and the test material used in this study was EPA Reg. No. 49538-1 which was cancelled on 10/10/89. This study was reviewed by FHB/TSS on 5/11/83. The remaining studies were conducted by Hazleton Laboratories and the test material used in these studies was EPA Reg. No. 61943-1. Three of these studies were reviewed and found to be acceptable by PRS/RD 6/23/89. The skin sensitization study (81-6) was reviewed and found to be acceptable by PRB/SRRD on 10/20/08. Since EPA Reg. No. 49538-1 was cancelled on 10/10/89 the Agency has no way of knowing what components were contained in the product. However, the Agency will allow the registrant to cite the primary eye irritation study (81-4) since it resulted in Toxicity Category I.

The Agency was able to compare the CSF's from the subject product and EPA Reg. No. 61943-1 and will allow the registrant to cite the acute oral study (81-1), the acute dermal study (81-2), the primary skin irritation study (81-5), and the skin sensitization study (81-6) conducted on this product.

The registrant is also citing an acute inhalation study (MRID #474929-1). This study was conducted by Stillmeadow, Inc. and the test material used in the study was the subject product. This study was reviewed and found to be acceptable by PRB/SRRD on 11/6/08.

RECOMMENDATIONS:

- The acute toxicity studies cited are acceptable to support the reregistration of EPA Reg. No. 65109-1.

The acute toxicity profile for EPA Reg. No. 65109-1 is currently:

Acute Oral	III	Cited ( $LD_{50} = 1540$ mg/kg)
Acute Dermal	III	Cited ( $LD_{50} > 2000$ mg/kg)
Acute Inhalation	IV	Cited
Primary Eye	I	Cited
Primary Dermal	III	Cited
Skin Sensitization	non sensitizer	Cited

NOTE: The acute toxicity study requirements have been satisfied for the subject product.